

MOT
GEORGE M. RANALLI, ESQ.
Nevada Bar No. 5748
JASON ANDREW FOWLER, ESQ.
Nevada Bar No. 8071
RANALLI ZANIEL FOWLER & MORAN, LLC
2400 W. Horizon Ridge Parkway
Henderson, Nevada 89052
ranalliservice@ranallilawyers.com
Attorney for Defendant,
EMPLOYERS MUTUAL CASUALTY COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DEL WEBB COMMUNITIES, INC., a)	
Nevada Corporation, and PN II,))	
INC. dba PULTE HOMES OF)	
NEVADA, a Nevada corporation,)	
	CASE NO.: 2:21-cv-00359-RFB-VCF
Plaintiffs,)	
vs.)	
LIBERTY INSURANCE CORPORATION,))	<u>DEFENDANT EMPLOYERS MUTUAL</u>
an Illinois corporation;)	<u>CASUALTY COMPANY'S MOTION</u>
COLONY INSURANCE COMPANY, a)	<u>FOR EXTENSION OF TIME</u>
Virginia corporation;)	(First Request)
EMPLOYERS MUTUAL CASUALTY)	
COMPANY, an Iowa corporation;)	
UNITED SPECIALTY INSURANCE)	
COMPANY, a Delaware)	
corporation; WESTFIELD)	
INSURANCE COMPANY, an Ohio)	
corporation; HARTFORD CASUALTY))	
INSURANCE COMPANY, an Indiana)	
corporation; CENTURY SURETY)	
COMPANY, an Ohio corporation;)	
JAMES RIVER INSURANCE COMPANY,))	
an Ohio corporation; and)	
VALLEY FORGE INSURANCE)	
COMPANY, a Pennsylvania)	
Corporation,)	
Defendants.)	

DEFENDANT EMPLOYERS MUTUAL CASUALTY COMPANY'S
MOTION FOR EXTENSION OF TIME
(First Request)

COMES NOW Defendant, EMPLOYERS MUTUAL CASUALTY COMPANY ("EMC"), by and through undersigned counsel, pursuant to Rules 6(b) and 12(a)(1)(A)(i) of the Federal Rules of Civil Procedure, and move this Court for an order to extend time to file an Answer or otherwise plead in the above-titled action. In support hereof, State Defendants show the following:

1. Plaintiffs' filed their Complaint on March 2, 2021.

2. Service was effected on June 24, 2021 via service on the State of Nevada Department of Business Division of Insurance.

3. The time for filing an answer or other pleading has not yet expired.

4. The parties are actively involved in negotiation, and it is anticipated, that granting this motion will save judicial resources and litigation costs.

5. This motion is not being filed for the purpose of undue delay, but is made based upon the desire to reduce litigation costs and preserve judicial resources as well as current assignments and the need for time to prepare a response.

6. Plaintiff does not object to the requested extension.

7. This is the first request for an extension.

///

///

1 THEREFORE, Defendant EMPLOYERS MUTUAL CASUALTY COMPANY
2 ("EMC") respectfully request the Court for an Order extending
3 the time to file an answer, or otherwise plead, up to and
4 including August 16, 2021.

5 DATED this 16th day of July, 2021.

6 **RANALLI ZANIEL FOWLER & MORAN, LLC**

7 */s/ Jason Andrew Fowler*

8 _____
GEORGE M. RANALLI, ESQ.

Nevada Bar No. 5748

JASON ANDREW FOWLER, ESQ.

Nevada Bar No. 8071


2400 W. Horizon Ridge Parkway

Henderson, Nevada 89052

Attorneys for Defendants,

EMPLOYERS MUTUAL CASUALTY COMPANY

13 IT IS SO ORDERED.

14 

15 _____
Cam Ferenbach

16 United States Magistrate Judge

17 Dated: 7-21-2021

RANALLI ZANIEL FOWLER & MORAN, LLC
2400 W. HORIZON RIDGE PARKWAY
HENDERSON, NEVADA 89052
TELEPHONE: (702) 477-7774 FAX: (702) 477-7778

CERTIFICATE VIA CM/ECF

Pursuant to FRCP 5, I hereby certify that I am an employee of RANALLI ZANIEL FOWLER & MORAN, LLC, and that on the 16th day of July, 2021, I caused to be served via CM/ECF a true and correct copy of the document described herein.

Document Served:

**DEFENDANT EMPLOYERS MUTUAL CASUALTY COMPANY'S
MOTION FOR EXTENSION OF TIME (First Request)**

Person(s) Served:

Scott S. Thomas, Esq.
Sara J. Odia, Esq.
PAYNE & FEARS, LLP
6385 S. Rainbow Blvd., Ste.
220
Las Vegas, Nevada 89118
Attorneys for Plaintiffs,
DEL WEBB COMMUNITIES, INC.
AND PN II, INC. dba PULTE
HOMES OF NEVADA

Christopher Blakesley II, Esq.
LBC LAW GROUP
3215 W. Charleston Blvd.
Suite 120
Las Vegas, Nevada 89102
Attorney's for Defendant,
HARTFORD CASUALTY INSURANCE
COMPANY

John H. Podesta, Esq.
**WILSON, ELSER, MOSKOWITZ,
EDELMAAN & DICKER LLP**
525 Market Street, 17th Floor
San Francisco, CA 94105-2725

Address for Personal Service:
300 S. 4th Street, Ste. 1100
Las Vegas, Nevada 89101
Attorneys for Defendant,
UNITED SPECIALTY INSURANCE CO

/s/ Donna Hicks

An EMPLOYEE OF
RANALLI ZANIEL FOWLER & MORAN, LLC